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District of Nevada

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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

SHANNEN BRADLEY, individually and as	)	
Personal Representative of the Estate of	)	
RICHARD WILLIAMS, deceased, SEAN	)	Case No. 2:12-cv-01526-APG-GWF
WILLIAMS and PATRICK WILLIAMS,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	
UNITED STATES OF AMERICA,	)	
	)	
Defendant.	)	

**STATUS REPORT AND  
MOTION TO STAY PROCEEDINGS PENDING COMPROMISE SETTLEMENT**

The United States of America respectfully requests this Court enter a ninety (90) day stay of all proceedings and deadlines, pending completion of the settlement that has been reached by the parties in this case. The requested time will allow the parties to complete the settlement agreement, allow for the exchange of payment pursuant to the settlement agreement and, thereafter, to execute and enter a Stipulation to Dismiss with prejudice.

1 In support of this motion, the United States submits as follows:

2 1. In lieu of a joint status report the parties seek this motion to stay. After several weeks of  
3 negotiations the parties have reached a compromise settlement.

4 2. Granting a ninety (90) day stay of the proceedings and deadlines in this matter, to allow  
5 the parties to complete the necessary actions to conclude their settlement agreement, is both in the  
6 interest of the parties and in the interest of preserving judicial resources.

7 WHEREFORE, the United States respectfully requests this Court grant a ninety (90) day stay of  
8 all proceedings in this matter.

9 Respectfully submitted this 16th day of January 2015.

10 DANIEL G. BOGDEN  
11 United States Attorney

12 /s/ Justin E. Pingel  
13 JUSTIN E. PINGEL  
14 Assistant United States Attorney

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18 IT IS SO ORDERED:

19 George Foley Jr.  
20 GEORGE FOLEY, JR.  
21 United States Magistrate Judge

22 DATED: January 20, 2015  
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